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February 3, 2017<sup>EST. 1882</sup>

U.S. Department of the Interior  
Bureau of Land Management  
Utah State Office  
440 West 200 South, Suite 500  
Salt Lake City, Utah 84145-0155

Color Country District Office  
176 East DL Sargent Drive  
Cedar City, Utah 84721

Re: Environmental Assessment, DOI-BLM-UT-C020-2017-0001-EA

Dear Sirs:

This is being written in response to the above mentioned Environmental Assessment. Garfield County is generally supportive of BLM efforts and supports a Finding of No Significant Impact (FONSI). Unfortunately, there are several issues that cause us concern.

1. Garfield County should have been afforded an opportunity for Cooperating Agency status. CEQ regulations require federal agencies consider local governments in their environmental processes. As evidenced by Section 5.2 of the Draft EA, only one county was consulted as part of the process. Garfield must be given the opportunity to involved as a Cooperating Agency.
2. Garfield County is in the process of developing a County Resource Management Plan. Ideally, the BLM and the County would be working together to reduce delay and duplication of effort. Regardless of the current situation where the County was excluded, BLM is required by FLPMA to be consistent to the maximum extent possible with County Plans.
3. Garfield County is concerned about opposition to the EA and potential changes in the agency's proposed action. In as much as we were not included in the entire process, we are fearful that we will also be excluded from additional discussions if the EA happens to be appealed. We desire to be included in any appeal phase of the project and will exercise any options we have – to the full extent of the law – to be included in any discussions resulting from appeals.
4. Garfield County asserts there are other parcels available for leasing that should have been considered. And we anticipate additional actions will continue to make oil and gas leases

County Commissioners  
Leland F. Pollock  
H. Dell LeFevre  
David B. Tebbs

Camille A. Moore, Auditor/Clerk  
A. Les Barker, Recorder/Surveyor  
Joseph Thompson, Assessor  
Gina Peterson, Treasurer

Russell B. Bulkley, Justice Court Judge  
Barry L. Huntington, Attorney  
James D. Perkins, Sheriff

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available for sale or lease. Energy extraction industries are a valuable component to local economies, and we support responsible development to the fullest extent of the law.

5. Garfield County has adopted a Sage Grouse Conservation Plan. In part, the plan requires priority habitats be evaluated using NRCS evaluation criteria to objectively assess suitability as Sage Grouse habitat. We anticipate the implementation phase of oil and gas development will be consistent with our wildlife conservation plans.

Once again, I reiterate Garfield County is generally supportive of the EA, but reserves its rights, considering the flaws listed above.

Sincerely,



Brian B. Bremner  
Garfield County Engineer